

EXHIBIT "A"

**Exhibit to Notice of Supplemental Rule 30(b)(6) Deposition
of Defendant Banc One Building Corporation – *Duces Tecum***

Defendant Banc One Building Corporation is directed to designate one or more officers, directors, or managing agents, to testify with respect to the following matters:

1. The specific dates of payment and the amount of each such payment by Banc One Building Corporation ("BOBC") to Forest Electric Corporation ("FEC"), for BOBC Project No. 6B- General Lighting & Power Contract at CDC2 (the "Project").
2. The specific dates of payment and the amount of each such payment by Banc One Building Corporation ("BOBC") to Forest Electric Corporation ("FEC"), for the project known as "RFP 21B IT Conveyance Cable – Pod A ("Pod A Project").
3. The specific dates of payment and the amount of each such payment by Banc One Building Corporation ("BOBC") to Forest Electric Corporation ("FEC"), for the project known as "RFP 21B IT Conveyance Cable – Phase II ("Phase II Project").
4. Any specific form of waiver of lien or parts thereof, which BOBC contends CCI must sign, with respect to the Project, the Pod A Project, and the Phase II Project.
5. Any specific form of general release or parts thereof, which BOBC contends CCI must sign, with respect to the Project, the Pod A Project, and the Phase II Project.
6. Any factual basis which BOBC contends it is entitled to a back charge or set-off against CCI, with respect to the Project, Pod A Project, and the Phase II Project.
7. The reason(s) BOBC or FEC are refusing to make final retainage payments to CCI for the Project, Pod A Project, and the Phase II Project.
8. The names of all persons involved in the decisions to withhold payment from CCI for final retainage payments for the Project, Pod A Project, and the Phase II Project.
9. The nature of all discussions between FEC and BOBC, regarding the withholding of payment from CCI for the Project, Pod A Project, and the Phase II Project.
10. Whether retaining for the Project, Pod A Project, and the Phase II Project were ever paid to FEC by BOBC, and the present location of such funds.

RKB/msj
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